

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. NEEDHAM
(OCA/USPS-T8-28)
(July 22, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and a request for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

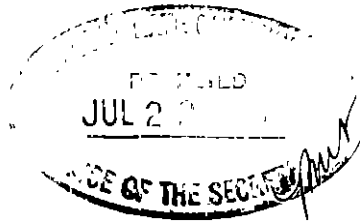
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney




OCA/USPS-T8-28. In your testimony at 106, you state,

The 1995 cost to manufacture a postal card was 1.1 cents. This cost is 0.7 cents higher than the cost presented in Docket No. R76-1.

- a. In R90-1, did the Postal Service include selling, shipping, and manufacturing costs of postal cards when developing the postal card pricing proposal presented? Please identify which of the above costs were included and cite the source(s) of your answer.
- b. In R94-1, did the Postal Service include selling, shipping, and manufacturing costs of postal cards when developing the postal card pricing proposal presented? Please identify which of the above costs were included and cite the source(s) of your answer.
- c. In preparing your testimony, please explain why selling and shipping costs were not included in your testimony at 106-107.
- d. Your testimony at 107 indicates that the proposed cost coverage of 170% reflects the high value inherent in the postal card. In establishing the proposed cost coverage, please identify what consideration was given to the lack of privacy a postal card message has.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY DREIFUSS
Attorney

Washington, DC 20268-0001
July 22, 1996